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Defendants.

RICHARD J. IDELL, ESQ. (SBN 069033) ORY SANDEL, ESO. (SBN 233204) 2 ELIZABETH J. REST, ESQ. (SBN 244756) **IDELL & SEITEL LLP** 3 465 California Street, Suite 300 San Francisco, CA 94104 4 Telephone: (415) 986-2400 5 Facsimile: (415) 392-9259 6 Attorneys for Plaintiffs Gregory R. Raifman and Susan Raifman, individually and as Trustees for the 7 Raifman Family Revocable Trust Dated 7/2/03. 8 and Gekko Holdings, LLC, an Alaska limited liability company, dba Gekko Breeding and Racing 9 UNITED STATES DISTRICT COURT 10 NORTHERN DISTRICT OF CALIFORNIA 11 GREGORY R. RAIFMAN, individually and as CASE NO. C 07-02552 EDL 12 Trustee of the RAIFMAN FAMILY REVOCABLE TRUST DATED 7/2/03, SUSAN 13 STIPULATION CONTINUING HEARING RAIFMAN, individually and as Trustee of the ON MOTION TO DISMISS FOR LACK OF RAIFMAN FAMILY REVOCABLE TRUST 14 PERSONAL JURISDICTION FILED BY DATED 7/2/03, and GEKKO HOLDINGS, LLC, STRATEGIC OPPORTUNITY SOLUTIONS, 15 an Alaska limited liability company, dba GEKKO LLC, D/B/A BUFFALO RANCH BREEDING AND RACING, 16 Plaintiffs, 17 July 24, 2007 Date: 18 ٧, Time: 9:00 a.m. 450 Golden Gate Avenue Place: CLASSICSTAR, LLC, a Utah limited liability 19 San Francisco, CA 94102 company, CLASSICSTAR FARMS, LLC, a Courtroom E. 15th Floor 20 Kentucky limited liability company, BUFFALO RANCH, a business entity form unknown, 21 Complaint Filed: May 14, 2007 GEOSTAR CORPORATION, a Delaware corporation, S. DAVID PLUMMER, SPENCER 22 D. PLUMMER III, TONY FERGUSON, The Honorable Elizabeth D. Laporte THOMAS ROBINSON, JOHN PARROT, 23 HANDLER, THAYER & DUGGAN, LLC, an Illinois Limited Liability Company, THOMAS J. 24 HANDLER, KARREN, HENDRIX, STAGG, ALLEN & COMPANY, P.C., a Utah professional 25 corporation f/k/a KARREN, HENDRÍX & ASSOCIATES, P.C., a Utah professional 26 corporation, TERRY L. GREEN, and DOES 1-1000 inclusive, 27

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All of the Plaintiffs in this action, through their undersigned counsel and Strategic Opportunity Solutions, LLC, d/b/a Buffalo Ranch, hereby stipulate as follows with regard to the hearing on the Motion to Dismiss for Lack of Personal Jurisdiction filed by Buffalo Ranch:

- The parties referenced above hereby stipulate that the hearing on the Motion to Dismiss for Lack of Personal Jurisdiction filed by Buffalo Ranch shall be continued from July 24, 2007 to July 31, 2007 at 9:00 a.m. in Courtroom E, 15th Floor the Honorable Elizabeth D. Laporte, presiding
- The date for filing opposition papers and reply papers shall run from the new date pursuant to local rule

The parties shall submit this Stipulation to/the Court for an Order thereon.

IDELL & SEITER L

Ву:

Richard J Idell Ory Sandel

Elizabeth J Rest

Attorneys for Plaintiffs Gregory R Raifman and Susan Raifman, individually and as Trustees for the Raifman Family Revocable Trust Dated 7/2/03, and Gekko Holdings, LLC, an Alaska limited liability company, dba Gekko Breeding and Racing

STOEL RIVES LLP

<u>211</u>5" (

Ву:

Heronald-Sim Educated C. Duck 255
Attorney for Strategic Opportunity Solutions. LLC d/b/a

Buffalo Ranch

PROOF OF SERVICE

I am employed in the City and County of San Francisco, State of California in the office of a member of the bar of this court at whose direction the following service was made. I am over the age of eighteen years and not a party to the within action. My business address is Idell & Seitel 465 California Street, Suite 300, San Francisco, California 94104.

On July 2, 2007, I served the following document(s):

STIPULATION CONTINUING HEARING ON MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION FILED BY STRATEGIC OPPORTUNITY SOLUTIONS, LLC DBA BUFFALO RANCH

- by regular **UNITED STATES MAIL** by placing a true and correct copy in a sealed envelope addressed as shown below. I am readily familiar with the practice of Idell Seitel & Rutchik for collection and processing of correspondence for mailing. According to that practice, items are deposited with the United States Postal Service at San Francisco, California on that same day with postage thereon fully prepaid. I am aware that, on motion of the party served, service is presumed invalid if the postal cancellation date or the postage meter date is more than one day after the date of deposit for mailing stated in this affidavit.
- by **E-MAIL TRANSMISSION**, by electronically transmitting a true and correct copy of the document(s) in Adobe Acrobat format to the electronic mail addresses indicated below:

John S. Blackman, Esq.
Farbstein & Blackman, APC
411 Borel Avenue, Suite 425
San Mateo, CA 94402
Fax: 650-554-6240
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vaimberg@stoel.com
Attorneys for Strategic Opportunity Solutions,
LLC d/b/a Buffalo Ranch

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Attorneys for ClassicStar, LLC, ClassicStar Farms, LLC, GeoStar Corporation, Tony Ferguson, Thomas Robinson and John Parrot J. Ronald Sim Stoel Rives LLP 600 University Street, Suite 3600 Seattle, WA 98101 Fax: 206-386-7500

Email: <u>jrsim@stoel.com</u>

Attorney for Strategic Opportunity Solutions,

LLC d/b/a Buffalo Ranch

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and I executed this declaration at San Francisco, California.

Suzanne Slavens